

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Case No: 21-cr-20590

Plaintiff,

v.

Hon. F. Kay Behm
United States District Judge

BOBBY BOSEMAN,

Defendant.

STIPULATED PROTECTIVE ORDER

1. Defendant Bobby Boseman is currently charged with two counts of sex trafficking and attempted sex trafficking; three counts of being a felon in possession of a firearm; one count of possession with intent to distribute cocaine; one count of possessing a firearm in furtherance of a drug trafficking crime; and one count of maintaining a drug premises.
2. During the course of the government's investigation, it has collected numerous records and various data from a wide array of sources. The records and data contain, among other things, private, non-public, sensitive, and personal identifying information for individuals, including names,

contact information, and other personal and private information (collectively, “Private Information”).¹

3. The government previously provided copies of some of these materials to the defense in discovery, with the Private Information redacted. The government redacted the Private Information in the produced discovery in order to advance the privacy and safety interests of the individuals whose information was included in the documents. Defense counsel was permitted to view unredacted materials with Private Information in person at the United States Attorney’s Office.
4. Defense counsel now seeks to receive unredacted copies of these materials containing Private Information to assist with its preparation of the case.
5. The Court hereby Orders the following:
 - a. The government may produce unredacted materials containing Private Information (the “Protected Documents”) to defense counsel to the extent necessary for the preparation of the defense, in compliance with the government’s discovery obligations. Possession, viewing, and/or sharing of the Protected Documents, and the Private Information contained within them, is hereby limited to the attorney(s)

¹ Private Information includes, but is not limited to, addresses, phone numbers, email addresses, social security numbers, dates of birth, license-plate numbers, and driver’s license numbers, criminal history information, and/or medical information.

of record, and investigators, paralegals, law clerks, experts, and assistants for the attorney(s) of record (collectively referred to herein as members of the defense team).

- b. The members of the defense team are prohibited from showing or providing copies of the Protected Documents to the defendant and/or any other persons.
- c. The members of the defense team may not share with the defendant any contact information, including addresses, phone numbers, and/or email addresses, for any individuals, which is contained in the Protected Documents, without prior approval of the Court.
- d. Protected Documents and Private Information shall be utilized solely in connection with the defense of the above-captioned case.
- e. Protected Documents and Private Information within them should not be copied or reproduced except as necessary to provide copies of the material for use by an authorized person as described above to prepare or assist in the defense, and all such copies and reproductions will be treated in the same manner as the original matter.
- f. Defendant's counsel shall inform the defendant of the provisions of this Protective Order, and direct him to adhere to the terms of the Protective Order.

- g. The members of the defense team shall not further disseminate the Protected Documents and/or any Private Information contained in the Protected Documents to any other persons, except as permitted by this Order.
- h. Defendant's counsel shall ensure that all individuals to whom any Protected Documents or Private Information are disclosed acknowledge this order in writing, and defendant's counsel will take reasonable steps to assure that such individuals comply with this Order.
- i. No party shall file Protected Documents containing unredacted Private Information of a person or entity other than a party client or coconspirator to the Court, nor reproduce the Private Information contained in the Protected Documents in any Court filing, unless the document is placed under seal or all non-client Private Information contained within the document has been removed, redacted, or anonymized.
- j. Nothing in this Order should be construed as imposing any discovery obligations on the United States or the defendant that are different from those imposed by case law, 18 U.S.C. § 3509(d), Rule 16 of the

Federal Rules of Criminal Procedure, and/or the Local Rules of this Court.

- k. The provisions of this Order shall not terminate at the conclusion of the prosecution of this case.
- l. Defendant's counsel and members of the defense team shall delete and destroy all Protected Documents in any format, including any copies provided to an authorized person, within 90 days from the conclusion of this case, specifically after the entry of a judgment and the conclusion of any direct appeal.

IT IS SO ORDERED.

s/F. Kay Behm
Hon. F. Kay Behm
United States District Judge

Dated: May 5, 2023

Stipulated and agreed to,

DAWN N. ISON
Acting United States Attorney

Dated: May 4, 2023

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